



State of New Jersey

Department of Environmental Protection
P.O. Box 402
Trenton, New Jersey 08625

PHILIP D. MURPHY
Governor

CATHERINE R. McCABE
Commissioner

SHEILA Y. OLIVER
Lt. Governor

May 13, 2019

Via eSIP

Honorable Peter D. Lopez
Regional Administrator
USEPA, Region II
290 Broadway
Mail Code: 25th Floor
New York, NY 10007-1866

RE: New Jersey State Implementation Plan Revision for the Infrastructure and Transport Requirements for the 8-hour Ozone National Ambient Air Quality Standards and Negative Declaration for the Oil and Natural Gas Control Techniques Guidelines

Dear Regional Administrator Lopez,

Enclosed for your review is a final revision to New Jersey's State Implementation Plan (SIP) for Air Quality; this SIP specifically includes:

- Infrastructure and Transport Requirements for Clean Air Act (CAA) Sections 110(a)(1) and 110(a)(2) for the 2015 70 ppb 8-hour Ozone National Ambient Air Quality Standard (NAAQS);
- Transport Requirements for CAA Section 110(a)(2)(D)(i)(I) for the 2008 75 ppb 8-hour Ozone NAAQS; and,
- Negative Declaration for the Oil and Natural Gas Control Techniques Guidelines (CTG).

New Jersey is submitting a certification that its existing SIP contains adequate provisions to meet the obligations under the CAA with respect to Section 110(a)(1) and (2) for the 2015 ozone NAAQS, and updates the SIP where changes occurred since the last Infrastructure SIP revision. New Jersey is submitting a complete SIP revision to address the "Good Neighbor" Transport SIP obligations under CAA Section 110(a)(2)(d)(i)(I) for both the 2008 and 2015 Ozone NAAQS. Additionally, this SIP revision includes a negative declaration for the Oil and Natural Gas CTG, as no regulated sources under this CTG currently operate in New Jersey.

New Jersey has met its "Good Neighbor" Transport SIP (GN SIP) obligations for both the 2008 75 ppb and 2015 70 ppb ozone NAAQS. To address its significant contribution to downwind states, New Jersey has taken several actions to reduce its contribution to transported ozone. Many of these measures are

more stringent than upwind and nearby states. All appropriate control measures have been adopted and implemented to address New Jersey's emissions that may significantly contribute to nonattainment or maintenance problems at downwind monitors in other states. The USEPA should ensure other upwind states that significantly impact downwind ozone nonattainment and maintenance monitors include measures similar to New Jersey's in their GN SIPs. It is USEPA's responsibility to ensure that upwind states do their part to address the transport challenges at the nonattaining monitors located within New Jersey and its shared nonattainment areas. The Cross-State Air Pollution Rule Update did not adequately and effectively require states to operate existing controls on electric generating units, as has been demonstrated by existing USEPA Air Markets Program Data.

New Jersey does not believe 2023 modeling is appropriate for all regions, as it is not protective of the Marginal classified nonattainment areas for the 2015 ozone NAAQS nor the Moderate or Serious classified areas for the 2008 ozone NAAQS. However, at USEPA's request, New Jersey included results from 2023 modeling, conducted by the Ozone Transport Commission, within the SIP revision.

Thank you and your staff for their assistance in reviewing drafts of this SIP revision. If you or your staff have any questions, please contact Francis C. Steitz, Director, Division of Air Quality, at (609) 633-8220.

Sincerely,



Catherine R. McCabe

Enclosures:
SIP Revision

c (Email letter):

Paul Baldauf, Assistant Commissioner, NJDEP
Francis C. Steitz, Director, Division of Air Quality, NJDEP
John R. Renella, NJ Deputy Attorney General
Rick Ruvo, EPA Region II
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